

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

JANE DOE,

Plaintiff,

vs.

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA, *et al.*;

Defendants.

Case No. 4:21-cv-03049

**UNOPPOSED MOTION TO EXTEND
PLAINTIFF'S RESPONSE DEADLINES**

COMES NOW the Plaintiff, Jane Doe, by and through her undersigned counsel, and pursuant to the Court's Civil Case Management Practices, hereby moves the Court for an Order extending the deadline for Plaintiff to respond to Defendants' Motion for Summary Judgment and Motion to Exclude Experts and any other motion they may file today (September 15, 2023), to November 10, 2023, for the following reasons:

1. On August 11, 2023, the Parties filed a Joint Motion to Extend Progression Order Deadlines. In that Motion, the Parties sought to extend Defendants' time to file Motions to Exclude Testimony on Daubert and related grounds, dispositive motions, and motion to bifurcate from August 15, 2023, to September 8, 2023 [ECF No. 69].
2. The Court granted that portion of the Motion [ECF No. 70].
3. In that Motion, the Parties also sought to Extend Plaintiff's time to respond to the above referenced motions to November 3, 2023 [ECF No. 69].
4. The Court did not rule on that portion of the Motion.
5. On September 5, 2023, Defendants filed an Unopposed Motion to Extend Deadlines for the above referenced motions from September 8, 2023, to September 15, 2023 [ECF No. 71].

6. The Court granted that Motion [ECF No. 72].

7. Plaintiff now seeks a coordinating one-week additional extension to her initial extension request, setting the deadline for her responses on November 10, 2023.

WHEREFORE, Plaintiff respectfully requests that this Court extend the deadlines as set forth herein. Defendants do not oppose this Motion.

Dated this 15th day of September, 2023.

JANE DOE, Plaintiff.

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and

/s/ Elizabeth K. Abdnour
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CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case as well as electronically transmitted.

/s/ Elizabeth K. Abdnour
Elizabeth K. Abdnour